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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 ANITA D. PARATLEY,) CASE NO. C-05-4312 (MMC)
12 Plaintiff,) [San Francisco County Superior
13 vs.) Court Case No. 05-445379]
14 CONSECO HEALTH INSURANCE) STIPULATION AND ORDER EXPANDING
COMPANY and DOES 1 through) THE STIPULATED PROTECTIVE ORDER
15 10,) PREVIOUSLY ISSUED BY THIS COURT
inclusive,) TO ENCOMPASS ADDITIONAL
16 Defendants.) DOCUMENTS
17 _____) Assigned to: The Honorable
 Maxine M. Chesney

STIPULATION

19 It is stipulated, by and between the parties to the above
20 entitled action, by and between their attorneys of record, as
21 follows:

22 This purpose of this stipulation is to expand the terms of
23 the Stipulated Protective Order, adopted as Order of this Court
24 on February 8, 2006, to safeguard against the disclosure of
25 additional confidential and/or proprietary Discovery Material,
26 not previously safeguarded under the terms of the Stipulated
27 Protective Order.

1 The parties hereinafter wish to expand the Stipulated
2 Protective Order as follows:

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4 1. Paragraph 1 of the Stipulated Protective Order, adopted
5 as Order of this Court on February 8, 2006, is expanded such that
6 it is now applicable to all discovery produced by the parties in
7 this action which contain information which is private,
8 confidential and/or trade secret, including all writings and
9 information contained therein (as defined in Federal Rules of
10 Evidence, Rule 1001), including but not limited to documents,
11 deposition testimony, deposition exhibits, and interrogatory
12 responses (the "Discovery Material").

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14 2. If any party in good faith disagrees with the
15 designation of Discovery Material produced by any other party or
16 third party, as CONFIDENTIAL, that party may seek court
17 intervention for a determination as to whether the Discovery
18 Material in question is entitled to protection from public
19 disclosure under governing law. Any material designated as
20 CONFIDENTIAL, retains all the protections afforded it by the
21 protective order, unless and until such time as a court of
22 competent jurisdiction makes a final determination that the
23 Discovery Material in question is not entitled to such
24 protections.

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26 3. The parties and their respective attorneys are in
27 agreement concerning the above terms of this Stipulated
28 Protective Order as acknowledged hereafter by the signatures of

1 the attorneys for the parties, and request the Court to enter
2 this Stipulation and Order.

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4 DATED: April 28 , 2006 LAW OFFICES OF MARC J. WODIN

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By: _____
6 /s/ MARC J. WODIN
7 Attorneys for Defendant CONSECO
HEALTH INSURANCE COMPANY

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9 DATED: April 27 , 2006 FRIEDMAN, RUBIN & WHITE, LLP

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By: _____
12 /s/ MICHAEL WHITE
Attorney for Plaintiff ANITA D.
PARATLEY

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ORDER

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Upon due consideration of the Stipulation and Order
Expanding the Stipulated Protective Order Previously Issued by
this Court, IT IS HEREBY ADOPTED AS ORDER OF THIS COURT.

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DATED: May 1, 2006

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Maxine M. Chesney
THE HONORABLE MAXINE M. CHESNEY
DISTRICT JUDGE OF THE UNITED
STATES DISTRICT COURT for the
NORTHERN DISTRICT OF CALIFORNIA